

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

CLAUDE PATTERSON,

Plaintiff,

v.

WORLD CHAMPIONSHIP WRESTLING, INC.,

TURNER SPORTS, INC., TURNER

ENTERTAINMENT GROUP, INC., and

TURNER BROADCASTING SYSTEM, INC.,

Defendants.

CIVIL ACTION FILE

NO. 1:01-CV-1152-CC

FILED IN CLERK'S OFFICE  
JAN 30 2003

By: *[Signature]* Clerk  
Deputy Clerk

APPENDIX OF DEPOSITION EXCERPTS

INDEX

1. Deposition of James A. Morrison
2. Deposition of Claude Patterson
3. Deposition of Vincent J. Russo



## EXHIBIT / ATTACHMENT



(To be scanned in place of tab)

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE NORTHERN DISTRICT OF GEORGIA  
3                   ATLANTA DIVISION

3     DAVIS v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER  
4         SPORTS, INC., CIV. FILE NO. 1:00-CV-1716-CC;  
5     SAENGSI PHAN v. WORLD CHAMPIONSHIP WRESTLING, INC. and  
6         TURNER SPORTS, INC., CIV. FILE NO. 1:00-CV-1719-CC;  
7     SPEIGHT v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER  
8         SPORTS, INC., CIV. FILE NO. 1:00-CV-1718-CC;  
9     WORTHEN v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER  
10         SPORTS, INC., CIV. FILE NO. 1:00-CV-1717-CC;  
11     REEVES v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER  
12         SPORTS, INC., CIV. FILE NO. 1:00-CV-1720-CC;  
13     EASTERLING v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER  
14         SPORTS, INC., CIV. FILE NO. 1:00-CV-1715-CC;  
15     ONOO v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER  
16         SPORTS, INC., CIV. FILE NO. 1:00-CV-0368-CC;  
17     NORRIS v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER  
18         SPORTS, INC., CIV. FILE NO. 1:00-CV-0369-CC;  
19     WALKER v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER  
20         SPORTS, INC., CIV. FILE NO. 1:00-CV-0367-CC;  
21     PATTERSON v. WORLD CHAMPIONSHIP WRESTLING, INC. and TURNER  
22         SPORTS, INC., and TURNER ENTERTAINMENT GROUP, INC.,  
23         CIV. FILE NO. 1:00-CV-1152-CC;

14  
15  
16  
17                   DEPOSITION OF JAMES A. MORRISON  
18                   MAY 17, 2002  
19                   10:10 A.M.  
20  
21  
22  
23  
24  
25

1 front of you, which is the E-mail about Thunderbolt  
2 Patterson?

3 A Uh-huh.

4 Q In that E-mail, after various inquiries  
5 about Mr. Patterson calling Dr. Schiller, you wrote an  
6 E-mail to Bill Busch saying, "I returned this call this  
7 morning at 10:00 a.m. I've known Thunderbolt for 30  
8 years. He is obviously looking for a position with WCW,  
9 and I don't see anything for him at this time."

10 A Uh-huh.

11 Q The position that Mr. Patterson was looking  
12 for was as a booker; correct?

13 MR. PONTZ: Object to the form of the question.

14 THE WITNESS: I don't remember every part of the  
15 specific conversation. But it was something like, well,  
16 your ratings are down. You know, I could come in and start  
17 writing your TV and I can get you ratings.

18 Well, there are, in my position, I get a lot  
19 of those phone calls from people that are talent, not so  
20 many from people that want to do the creative side, but  
21 actually to a much lesser degree.

22 And like I said, I've known Claude for 30  
23 years. When I broke into the business, he was wrestling.  
24 I think I wrestled him. When I started full-time, he was a  
25 main eventer in Charlotte, drew a lot of money. And I

1 benefitted from that. He was a very charismatic guy.

2 But he has never had any experience, to my  
3 knowledge, booking, matchmaking, writing TV. And there  
4 have been a lot of successful people in wrestling who as  
5 performers in their own career have done very well, but  
6 once they're responsible for the big picture and 25 or 30  
7 guys and eight or ten matches instead of one, that's not  
8 what they excel at.

9 BY MR. ICHTER:

10 Q Well, did you --

11 A And talking to Thunderbolt, you know, he had  
12 never done -- he's not a kid. I'm older than he is. I  
13 don't know exactly how old he is. But I, if you'd have  
14 asked me, I would have thought he's probably a couple years  
15 younger than I am.

16 So you know --

17 Q Did he say he wanted to be the head booker?

18 A I don't remember his exact words, but that  
19 he wanted to come in and, you know, take over creative and  
20 write TV.

21 Q Before Glen Gilberti, Disco Inferno, came  
22 into the WCW, did he have any experience being a booker?

23 MR. PONTZ: Object to the form of the question.

24 THE WITNESS: I don't know.

25 BY MR. ICHTER:

1 THE WITNESS: I don't know.

2 BY MR. ICHTER:

3 Q Did anyone ask Mr. Patterson to come in for  
4 an interview?

5 A No.

6 Q Did anybody give him anything but the bum's  
7 rush saying, essentially, thanks but no thanks in a single  
8 phone call?

9 MR. PONTZ: Object to the form of the question.

10 THE WITNESS: Yeah. I mean, you know, I take  
11 offense to -- I don't think I gave him the bum's rush. I  
12 gave him the courtesy. And I think our phone call was a  
13 rather lengthy one, as I remember it.

14 BY MR. ICHTER:

15 Q Well, he wasn't asked to come in, he wasn't  
16 invited for an interview, and he didn't get any more  
17 consideration than a single phone call back; correct?

18 MR. PONTZ: Object to the form of the question.

19 THE WITNESS: My typical answer to people that  
20 call, some of which I know on a personal basis, some of  
21 which I don't is, you know, I will mention it, throw your  
22 name in the hat, see what the response is, and if there's  
23 interest, I will get back to you.

24 BY MR. ICHTER:

25 Q You say in your E-mail, "I told Patterson

1 that I would discuss the matter with Bill Busch, which I  
2 have."

3 A Yes.

4 Q What was your discussion with Bill Busch?

5 A I just told him that I've known Thunderbolt  
6 for 30 years. He was a main event performer. He's been  
7 out of wrestling to my knowledge for, I've been here for  
8 five years, and I've been in the WWF for eight years, he's  
9 been out of wrestling for maybe 15 years that I know of and  
10 has no experience doing this.

11 So if you're -- if I had to express an  
12 opinion, here's a guy who picks up the phone and calls  
13 somebody who hasn't been in wrestling for 15 years, that  
14 has no experience doing that job. And I do remember going  
15 up to the booking committee, and I don't know who was in  
16 there that day, but saying, you know, Thunderbolt Patterson  
17 called and expressed an interest in booking.

18 A lot of times, guys would, okay, and not  
19 even comment. But it was thrown out there. The name was  
20 mentioned in case somebody had a personal experience with  
21 him that I wasn't aware of and said, you know, he's been  
22 out of wrestling, but did you know, no, I didn't know.

23 Q Could he have been an agent?

24 MR. PONTZ: Object to the form of the question.

25 THE WITNESS: I don't know.





## EXHIBIT / ATTACHMENT

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(To be scanned in place of tab)

From: Dillon, JJ  
Sent: Friday, October 15, 1999 5:15 PM  
To: Busch, Bill  
Subject: RE: msg. that came to HWS

I returned this call this morning at 10:00 AM. I've known "Thunderbolt" for thirty years. He is obviously looking for a position with WCW, and I don't see anything for him at this time, though I told Patterson that I would discuss the matter with Bill Busch, which I have.

Thanks.

"J.J."

-----Original Message-----

From: Busch, Bill  
Sent: Tuesday, October 12, 1999 1:34 PM  
To: Daves, Katherine  
Cc: Dillon, JJ  
Subject: RE: msg. that came to HWS

Thanks - I will have JJ follow-up on this.

Bill

-----Original Message-----

From: Daves, Katherine  
Sent: Tuesday, October 12, 1999 1:13 PM  
To: Busch, Bill  
Subject: FW: msg. that came to HWS

This gentleman called today. Wanted you to know I had previously listed his number as 404/763-3927 and it's actually 3937. I explained there was an error in his number and that we would relay the message again. You may have tried him but not received an answer as it had the wrong number included. I think he might be crazy, so you may not want to call him back, however in case you tried I wanted you to know the number was wrong that we gave you. He doesn't seem to get that he needs to call your office and keeps asking for us to have Dr. Schiller call him back.

-----Original Message-----

From: Daves, Katherine  
Sent: Tuesday, September 28, 1999 1:42 PM  
To: Busch, Bill  
Subject: msg. that came to HWS

Thunderbolt Patterson called from Athletes in Support of Kids. Said he's calling regarding WCW and some suggestions on ratings. Says he's a former wrestler. I don't know how you want me to handle these calls since there are so many parties that have been checking with us about WCW issues. I explained to him that Dr. Schiller had been forwarding the calls concerning WCW operations to you as you were head of the organization and reported to Dr. Schiller. Most of the time people still insist they want to leave a message for HWS as well. Should you feel someone should follow up with Patterson his number is 404/763-3937.

Thanks.

**PLAINTIFF'S  
EXHIBIT**

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**WCW 009232  
CONFIDENTIAL**



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VIDEOTAPED DEPOSITION OF CLAUDE PATTERSON  
MARCH 1, 2002  
10:00 A.M.

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CERTIFIED COURT REPORTERS

The Pinnacle, Suite 500 • 3455 Peachtree Road, N.E. • Atlanta, Georgia 30326 • [www.premierrptg.com](http://www.premierrptg.com)

404-237-1990

800-317-5773

1 Q Are all the relatives that you spoke about  
2 before living in this state?

3 A No -- my daughters are here.

4 Q Your daughters are here?

5 A Yes, granddaughters, grand kids and great  
6 grand kids and ex-wife.

7 Q One of your ex-wives?

8 A Yes.

9 Q Are both of your ex-wives still alive?

10 A I know one of them is. I don't know about  
11 the other one.

12 Q Which ex-wife is living here in this  
13 state?

14 A Betty Campbell.

15 Q Let's talk about your experience in  
16 professional wrestling. When did you first become  
17 involved in professional wrestling?

18 A 1965.

19 Q Where was that?

20 A Kansas City, Missouri. Waterloo, Iowa.  
21 Used to come to my hometown.

22 Q And who did you wrestle with in 1965?  
23 What company or organization?

24 A National Wrestling, NWA.

25 Q And how long did you wrestle with the NWA

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1 Q Last year or two?

2 A Yes, just before they closed down.

3 (Whereupon, the court  
4 reporter marked Patterson  
5 Exhibit No. 2 for  
6 identification.)

7 Q (By Mr. Richardson) If you would, Mr.  
8 Patterson, just look at the documents that I've just  
9 handed you, collective documents that are Exhibit  
10 Patterson 2, tell me if you have seen those documents  
11 before.

12 A Uh-huh.

13 Q What are these documents?

14 A Pay, draws, draws and pay.

15 Q What are draws?

16 A When you go to the place and they let you  
17 have a draw on the money that you're going to make at  
18 the place because you ain't got no money.

19 Q I'm unfamiliar with the type of pay  
20 arrangement. Could you just generally describe how it  
21 would work, that you would get paid for an event?

22 A You mean now? Then?

23 Q For these events.

24 A They pay you by check at the end of the  
25 week, but during the week, wherever you go, they give  
you a draw. And as you see on these ten places, I  
wasn't going to too many different places. These was

1 the tail end of the part that I was working a little  
2 bit before they got rid of me altogether.

3 Q So you did some wrestling for World  
4 Championship Wrestling in '90 and you did this Old  
5 Timers Event in the early '90s?

6 A It was '93.

7 Q '93?

8 A Yes.

9 Q Do you recall doing any wrestling for WCW  
10 between '90 and '93, between these events that are here  
11 in Patterson 2?

12 A A little bit. A little bit. Just like  
13 these here, like a cow in the road, they never would  
14 give me no steady work, never would give me the  
15 Pay-Per-Views or the house shows that was making some  
16 money. You can go into their records and you can see  
17 comparing to this, dollars and cents, it don't even  
18 touch nothing. And I mean -- and I'm a similarity to  
19 the Hulk Hogans, the Dusty Rhodes, the Randy Savages,  
20 the Goldbergs or the Lex Ligers, the Stings, and we're  
21 the same age, some of them.

22 Q Between '90 and '93, can you estimate how  
23 many events you worked a year?

24 A I can't, no. I can't. If -- my stuff is  
25 strode. I can't say -- I couldn't say. You got all

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1 the records with them. They got all the records. They  
2 can tell you. Why don't you give us that?

3 Q You don't recall whether you were working  
4 more than once a month?

5 A I'd like for you to give that to my  
6 lawyers, because they got all that. Give my lawyers  
7 all the time that I worked with them.

8 Q Well, I'm asking for your recollection.

9 A I'm telling you I don't recollect. I need  
10 some help on it. And I'd like for you to make that  
11 available for my lawyer so they can see what it was.

12 Q You don't recall whether you worked more  
13 than once a month in a particular year?

14 A I worked like in the road, you know, a cow  
15 in the road. I can't say the word. But I mean, TV --  
16 I worked on the TVs where the exposure -- where they  
17 would -- what's the word for it? -- show the people a  
18 picture that I'm there, but I ain't, show the people on  
19 TV that I'm working, but I'm not getting no work. You  
20 follow what I'm saying?

21 Q You mean people that you were wrestling --

22 A No, no, no, no. I'm talking about the  
23 public. I'm talking about the people on the  
24 television, the people that paid -- my fans, making  
25 fools out of my fans that I'm there, but I don't get



1 the Pay-Per-Views, I don't get the house shows. Didn't  
2 get them. I was begging to get this. I had to beg to  
3 get this.

4 And that was not only '90. I'm talking  
5 about I begged 2001, 2000, '99, '98, all the way on  
6 back to this here. Been begging ever since. Asked  
7 them for a job, a way to take care of my family. You  
8 all have the billings that every one of them got  
9 from -- I won't say Ted Turner, but all of the rest of  
10 them, all the way down to the top wrestler. Not the  
11 low ones. All of the in-betweens, all of the ability  
12 here, but they overlook or make a mock out of me  
13 because I'm black.

14 And I want to be treated fair and equal,  
15 just a job, take care of my family, but I have to go  
16 through this here just because I want my equal rights  
17 of a business that they taught me how to do from one  
18 thing -- from top to bottom. Wouldn't even let me  
19 train individuals. Bobby Walker, Carr, wouldn't let me  
20 train them. Rick Reeves, Dusty Hawk. Stole my  
21 charisma.

22 Q After that Old Timers Event --

23 A And can I say one thing?

24 Q Absolutely.

25 A Ole -- not Ole, but Jody confirmed all of

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1    what I'm just saying. Stole them. Stole them. His  
2    words was they should be paying me off half of their  
3    money. Stole all of the stuff that I do. Because you  
4    know what their motto was, what George Scott was? "We  
5    take a nigger off of a garbage truck and make him  
6    because we're going to only use him so much. You  
7    nigger stay in your place. Where can you go and make  
8    this kind of money?"

9                   And I wasn't making no money at all. But  
10   the token niggers wasn't making what none of your white  
11   people that you are representing -- all the white  
12   people that you're representing make more money than  
13   all the black people that's in -- that you're  
14   defending. You probably make less than some of them.

15           Q       Since '93, when you did the Old Timers  
16   Event --

17           A       Yes, sir.

18           Q       -- have you done any work for WCW?

19           A       That was -- this was the times when --  
20   after Ice Train, Ice Train, the Steiners --

21           Q       Okay.

22           A       -- yes, uh-huh. And they nipped all that,  
23   nipped all that, all that was time -- yes.

24           Q       So you did -- for some period of time, you  
25   were a manager for Ice Train?

1           A       I was out there. I went -- when they were  
2     introducing him, like I said a moment ago -- excuse me,  
3     they say we was going to do all this and do all that,  
4     but they just went out there to get my recognition of  
5     being with Ice Train. And then when it come down to a  
6     contract and a job, Eric Bischoff, Busch said no. They  
7     took Ice Train, but they didn't take me. Why? Was I  
8     not qualified? Not talking anything else. We're  
9     talking about wrestling, professional wrestling. Was I  
10    not qualified to be a trainer, to be an announcer, to  
11    be a booker, to be an owner, whatever? Was I not  
12    qualified?

13                   MS. ROTHENBERG: Can we take a five-minute  
14    break?

15                   MR. RICHARDSON: Yes.

16                   MS. ROTHENBERG: Or a ten-minute break.

17                   (Whereupon, there was a brief recess.)

18           Q       (By Mr. Richardson) Coming back from our  
19    break, Mr. Patterson, during the time that -- at any  
20    point in time did you ever sign a written agreement  
21    with WCW?

22           A       No. I asked for a contract, but they sure  
23    wouldn't give me none.

24           Q       When you did do work for WCW, who asked  
25    you to do that work or who --

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1           A       The bookers, bookers.

2           Q       Who hired you to do that work?

3           A       The booker.

4           Q       Who is the booker?

5           A       At that time, Ole was the booker, and then  
6 Eric Bischoff was the booker, took over after Ole.

7 Then they -- you know how they put schedules, they put  
8 your name on a schedule, piece of paper, pass it  
9 around, and that's how you know where you are.

10          Q       Do you recall what period of time it was  
11 that Ole Anderson was the booker?

12          A       Ole Anderson was the booker for a long  
13 time. I don't know what the period was, but when  
14 Bischoff moved Ole out, back to back, and then Ole came  
15 back. That's the only way I could get some work when  
16 the places got down. Ole knew talent. All them big  
17 money and stuff and whatever, they wasn't drawing no  
18 money. But they wouldn't give me none. But Ole would  
19 get me a little piece of work, a tease, all they would  
20 let him do.

21          Q       You think Ole Anderson would have given  
22 you more if they had -- if somebody else had let him?

23          A       Certainly. He told me that Barney -- he  
24 told me also Robert Fuller, which was a booker -- not a  
25 booker, yeah, a booker, a manager, he also told me in

1 Turner Entertainment?

2 A I've answered questions.

3 Q Would it be the same as to Turner  
4 Broadcasting Systems?

5 A I've answered them questions.

6 Q Let's talk about what relationship, if  
7 any, you have with some other folks who filed lawsuits  
8 against WCW for discrimination. Do you know Tony Carr?

9 A Yes, I do.

10 Q Did you know Tony Carr before you filed  
11 your lawsuit?

12 A He worked for me.

13 Q Where did he work for you?

14 A I have a business. You didn't ask me that  
15 from the get-go.

16 Q And what is your business?

17 A Athletes Supporting Kids.

18 Q Is that a corporation?

19 A Yes, it is.

20 Q Is that for profit or not for profit?

21 A Nonprofit.

22 Q And are you the only owner?

23 A I'm the executive director.

24 Q Who owns Athletes Supporting Kids?

25 A I do. My board does. We do.

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1 Q Who is on your board other than you?

2 A By name?

3 Q Yes.

4 A All of them?

5 Q How many board members do you have?

6 A I think seven.

7 Q Are there any current or former

8 professional wrestlers on your board?

9 A No.

10 Q And how long have you been involved with

11 Athletes Supporting Kids?

12 A Since '91.

13 Q Did you start that yourself?

14 A No.

15 Q How did you acquire that?

16 A I needed a job when I couldn't get none,  
17 when I couldn't get no work. I had a job -- I had to  
18 get a job. I started working there.

19 Q And what do they do? What does Athletes  
20 Supporting Kids do? It's a group home? They run a  
21 group home?

22 A Uh-huh.

23 Q Now, you started working there in '91?

24 A Uh-huh.

25 Q And how long --

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1 working, they don't want to fool with you anyway. You  
2 trouble. They don't want to fool with trouble-making  
3 niggers," but I was Thunderbolt Patterson with the  
4 Steiners to -- Ole understood my drawing ability, my  
5 namesake, then they -- somebody shut that off. I'd  
6 like to know who, too.

7 Q You don't know who made the decision to  
8 shut that down?

9 A I don't know who made none of all of them  
10 decisions because they come from the top down.  
11 Everybody that you say doing is lying about what they  
12 said done. Somebody making some decisions over there.

13 Q When that happened back in '93, did they  
14 hire somebody else to manage the Steiners, to replace  
15 you as manager?

16 A Bischoff said they didn't want no more  
17 managers. Bischoff said, "We don't need no managers."  
18 Two weeks after that, Jody Hamilton was out the  
19 managing.

20 Q The Steiners?

21 A Not the Steiners. Managing.

22 Q If I could, let me just try and keep you  
23 at what happened with the Steiners and then we'll go to  
24 the next folks, who the next folks were.

25 MS. ROTHENBERG: I think he was testifying

1 asking me what could I contribute to WCW, and he hired  
2 Kevin Sullivan. All of them -- Kevin Sullivan, Hart,  
3 Kevin Nash, all them individuals after me, and I was a  
4 known name recognition that could be marketed and draw  
5 people and wrestle and work, commentate, manage and  
6 book. All of the qualifications that all of them  
7 individuals that they had there at that time was not in  
8 my league even. That's the reason that organization  
9 crumbled because they picked the majority of white  
10 people in those positions that didn't know what they  
11 was doing, or friends or whatever.

12 Q Paragraph 47 says, "Upon information and  
13 belief, defendants later offered a contract to Ice  
14 Train and hired a white male to manage him."

15 Do you know who the white male that was  
16 hired to manage him -- do you know his name?

17 A They put some people -- I can't -- not  
18 offhand. I can't think. They brought several people  
19 in managing after -- but I can't think of it now at  
20 this point.

21 Q Do you recall the name of any managers  
22 that were hired after he told you no, after Eric  
23 Bischoff told you he wasn't going to hire you as a  
24 manager?

25 A Look, I mean, they used people that they



1 individuals that you mentioned --

2 MS. ROTHENBERG: Objection; asked and  
3 answered.

4 Q (By Mr. Richardson) -- is that correct?

5 The second sentence in Paragraph 48 says,  
6 "Instead, defendant suggested that plaintiff work for  
7 them without a contract for \$100 per television taping  
8 he attended."

9 Who suggested that to you?

10 A Here that is, here that is the same thing  
11 they was doing then, that was Ole Anderson. For  
12 whatever reason, there it is right here, same thing you  
13 gave me a while ago, that \$100, them draws. Remember  
14 them \$100?

15 Q Yes. Is that Exhibit 2 that you're  
16 referring to?

17 A Yes.

18 MS. ROTHENBERG: For the record,  
19 Defendant's Exhibit 2.

20 THE WITNESS: I begged for a contract.  
21 Then I think they went to \$150 a show.

22 Q (By Mr. Richardson) Paragraph 49 says,  
23 "Throughout 1994 and 1995, plaintiff contacted  
24 defendants via telephone and in person to apply for a  
25 position as a wrestler or booker and/or manager.

1 obvious, wasn't it?

2 Q The '94/'95 time frame, what, if anything,  
3 did Ole Anderson tell you about a position as a  
4 wrestler or booker or other manager?

5 A That he couldn't do it, they wouldn't  
6 allow him to do it.

7 Q Do you have an understanding of who made  
8 the decision?

9 A No, no. The powers, so that's  
10 questionable, you know. Did it go all the way up to  
11 Ted or did it come down from the wrestling people?  
12 That's questionable who done that.

13 Q Again, you wouldn't know what they based  
14 that decision on?

15 MS. ROTHENBERG: Objection. He's  
16 testified that he believes it was based on his race  
17 several times.

18 Q (By Mr. Richardson) It's your belief that  
19 it was because of race; is that right?

20 A Thunderbolt and racial, racial, denial,  
21 teaching a lesson.

22 Q But no one ever told you why they --

23 A Ole told me. Ole told me and Robert  
24 Fuller told me, for me to think that I could be a  
25 promoter or a booker or owner or be equal to any of

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1 those people.

2 Q But Ole Anderson wasn't a decision-maker?

3 A Ole Anderson was signing -- was signing  
4 the contracts at that time until Bischoff took over,  
5 but when it came to me, go back to the old school,  
6 because you asked me a while ago was they holding a  
7 vendetta because of me being black and me being who I  
8 am, trying to get everybody to duplicate me, but not  
9 have me. Deny me my rights, deny me to make money.  
10 Very low, very low thing in a company that Ted Turner  
11 got any part of being -- getting the Trump Award. Very  
12 low. If anybody knew anything about that -- that's a  
13 very low thing to be affiliated with an organization  
14 that treat black people the way they treated Rocky, the  
15 way they treated Tony and the way they're treating  
16 Bobby. It's a shame. And knowing it, publicly knowing  
17 it and on record at EEOC.

18 Q Let's go to the next page, Paragraph 50.

19 A Fifty.

20 Q "In or about 1995, Eric Bischoff told  
21 plaintiff that he was too old to work for defendants  
22 and that defendants did not need any more people  
23 working as managers."

24 We've already discussed that conversation;  
25 right?

1           A       Yes, we did.

2           Q       And Paragraph 51, "Upon information and  
3 belief, in or about 1995, defendants employed similarly  
4 situated white individuals as wrestlers and managers.  
5 Furthermore, defendant created management positions for  
6 similarly situated white wrestlers."

7                   Now, as far as wrestlers and managers, you  
8 gave me some names of people who were hired that you  
9 thought were similarly situated.

10          A       Uh-huh.

11          Q       Is there anyone else you want to add to  
12 that list?

13          A       Oh, there's a number of individuals. All  
14 of the individuals that ended up with them -- I mean,  
15 you know the names. All the individuals that ended up  
16 with them when they shut down and then go back to the  
17 Ric Flairs, the Dusty Rhodes, the Hulk Hogans, the  
18 Randy Savages, the Sid Vicious, all of them  
19 individuals, and half million dollar contracts,  
20 \$250,000 contracts. I couldn't even get a contract.  
21 Something ain't right here.

22          Q       Now, in this '95 time frame, do you know  
23 who was making the decision to hire wrestlers and  
24 managers?

25          A       You know more about that than I would.

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1 Q So you don't know?

2 A You would know more about that than I do.  
3 I don't know. If Bischoff was there, Bischoff was the  
4 one. Bischoff was there. He was the one, the hiring  
5 and firing and -- speaking of '95; is that right?

6 Q Right.

7 A I believe also during that time that  
8 J.J. Dillon moved on up the ladder a little bit over to  
9 the decision-making stuff, too, behind the scenes,  
10 across where the wrestlers couldn't go. Known racist.

11 Q J.J. Dillon?

12 A Yes, sir.

13 Q In this time frame, '93 -- going '93  
14 forward, has J.J. Dillon ever made any racist or  
15 derogatory comments towards you?

16 A I talked with J.J. Dillon about a job. I  
17 called Busch's office seeking to talk with Busch. His  
18 secretary told me that she would have him call me, but  
19 they had J.J. Dillon to call me.

20 Q Let me just ask you to pause for a second  
21 and take a look at Paragraph 53 and 54 of your  
22 Complaint --

23 A Uh-huh.

24 Q -- those paragraphs referring to that, the  
25 call you made to Bill Busch, and J.J. Dillon returning

1 the call.

2 A Uh-huh, J.J. Dillon returned the call.

3 Q And this was in late 1999 or early 2000?

4 A Uh-huh.

5 Q Tell me as much as you can remember about  
6 what was said in that conversation.

7 A That they had scriptwriters, they had  
8 somebody coming in, and that I wouldn't fit into what  
9 they're doing now and that they don't need my services.  
10 I stated to him that -- as it was back then, that he  
11 was a racist, that I needed to talk to his boss, but he  
12 was the go-through person and I never heard anything  
13 else from Busch or that office.

14 Q When you said that they had  
15 scriptwriters --

16 A That's when they brought in that Russo. I  
17 think that's when the Russo was coming on the scene,  
18 coming off the New York -- that's when the WCW was  
19 stealing Power Play, stealing all the people down --  
20 Eric Bischoff was making his move to take over and  
21 Russo come in. That's a vicious dog.

22 Q So when J.J. Dillon told you that they had  
23 a scriptwriter, then that was true, to your  
24 understanding?

25 A That's what he said. I asked him about

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1 booking, booking or a job in any capacity. Still  
2 had -- when they closed down, they had a booking  
3 committee, and that scriptwriter was not a wrestler,  
4 didn't know nothing about wrestling. He just happened  
5 to come out from the soap opera mentality from New  
6 York, wife and kids and daughters, and just soap  
7 operas, portraying evil things. Soap operas. Not  
8 about wrestling at all. I mean, nothing but a trip.

9 Q So this was -- what Vince Russo was doing  
10 was different, was a different kind of --

11 A They ran it on into the ground.

12 Q It was different than booking, as you  
13 understood it or as you practiced it?

14 A They was still doing the booking. They  
15 still had to do booking. You cannot get away from  
16 booking. You just had some smart person think they  
17 know what to do to try to change it all from the  
18 wrestling to Hollywood.

19 MS. ROTHENBERG: Is this a good time to  
20 take five?

21 MR. RICHARDSON: Yes.

22 (Whereupon, there was a brief recess.)

23 Q (By Mr. Richardson) We're back from our  
24 break. I wanted to ask you a little bit more about  
25 J.J. Dillon. At the point in time when you spoke to

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1 MS. ROTHENBERG: That's true.

2 Q (By Mr. Richardson) Have you ever  
3 wrestled J.J. Dillon?

4 A Yes.

5 Q Many times?

6 A A few times. He wasn't in my category.

7 Q He was a mid-card or a lower-card  
8 wrestler?

9 A Yes. He was lower, uh-huh. Put him at --  
10 he couldn't wrestle, so put him as manager and he was  
11 office. Office person, I mean.

12 Q What made you believe that J.J. Dillon was  
13 a racist?

14 A Oh, events and things that happened over  
15 years.

16 Q Can you give me an example of something?

17 A Calling folks niggers, calling people  
18 niggers years ago, and being caught in situations that  
19 was clearly not pertaining to wrestling, and the way he  
20 acted of his status of wrestling and how he was close  
21 to office and the decisions and the outcomes of  
22 different events.

23 Q So over time, you've personally heard him  
24 use racial slurs --

25 A Yes.



1 J.J. Dillion on the telephone in late '99 or early  
2 2000, did you understand whether he had any authority  
3 to hire you?

4 A Power, he was over on the power side.

5 Q So you believe he did have the authority  
6 if he wanted to?

7 A Yes. Power. Power to hire or recommend.  
8 Power.

9 Q And when he said he didn't have a place  
10 for you, you believed that was because of race?

11 A Yes.

12 Q What made you believe that he wasn't going  
13 to hire you because of race?

14 A I know J.J. Dillon and been knowing him  
15 for years when he tried to wrestle and couldn't, and  
16 had differences, differences with him then.

17 Q When was that?

18 A Oh, that goes back, goes way back, '70s,  
19 '80s, way back.

20 Q So he was a professional wrestler at some  
21 point in time a long time ago?

22 A Yes, yes.

23 MS. ROTHENBERG: Are we that old that '70s  
24 and '80s is a long time ago?

25 MR. RICHARDSON: '70s is 30 years ago.

1 A And promoter.

2 Q And promoter?

3 A Uh-huh.

4 Q That's right, we talked about. You may  
5 have answered this before, and if you did, I apologize,  
6 but do you know who made the decision at WCW about who  
7 to use as a promoter for developmental talent?

8 A No, sure don't.

9 Q Anything else? Anything else WCW denied  
10 you on the basis of race? Any other positions?

11 A WCW -- no, not WCW, no.

12 Q Let's talk about -- we've talked about  
13 race. Now let's talk a little bit about age  
14 discrimination.

15 A Okay. What paragraph you in?

16 Q Let's look at Paragraph 50 on Page 16.

17 A Bouncing back, huh? I thought you was  
18 going forward, trying to get through with this.

19 Q I did the race first, now I'm going to try  
20 and see what we've got on age.

21 A Okay.

22 Q That one was your conversation with Eric  
23 Bischoff in '95?

24 A Uh-huh.

25 Q "Eric Bischoff told plaintiff that he was

Page i11

1 too old to work for defendants and that defendants did  
2 not need any more people working as managers."

3 A Uh-huh.

4 Q When he told you that, did you believe  
5 then that you were being discriminated against because  
6 of your age?

7 A And racial, both of them, age, racial,  
8 yeah.

9 Q Both?

10 A Yes.

11 Q Now, why do you think -- well, I won't --

12 A Because he told me.

13 Q Because he told you you were too old.

14 Now, when you had the conversation with J.J. Dillon in  
15 late '99 or early 2000, did he say anything about your  
16 age in that conversation?

17 A J.J. Dillon said in a sarcastic, sarcastic  
18 way that the things that -- he there, in the midst of  
19 the stuff, but saying that -- and his ability wasn't  
20 nowhere near mine, and he's saying that back in the  
21 '70s and '80s, "We don't do it like that no more." I  
22 mean, any and everything that you deal with, progress  
23 and grow. Everything that you deal with got older  
24 people some way in the mix, especially in the  
25 management or decision, just like he is. The only

1 reason he said what he said had to be racial, knowing  
2 him.

3 Q So in that phone call, you believe that  
4 that was -- that phone call with J.J. Dillon, you  
5 believe that was racial, not age?

6 A Yes.

7 MS. ROTHENBERG: Asked and answered  
8 several times.

9 THE WITNESS: Bischoff was the age man.

10 Q (By Mr. Richardson) Did anyone else,  
11 other than Eric Bischoff at WCW, do or say anything to  
12 you that you believe was age discrimination?

13 A Couldn't get to nobody else.

14 Q Other than the conversation that you had  
15 with Eric Bischoff in '95, was there any other contact  
16 that you had with Eric Bischoff where you believe you  
17 were discriminated against by him because of your age?

18 A No. Couldn't get to him no more.  
19 Wouldn't return no messages. But he -- they put back  
20 the older people when -- when -- at one point in time  
21 they was -- that Crockett and them come -- when the  
22 Crocketts come on the scene, they start talking about  
23 the young lions, the younger guys, and they ran it in  
24 the ground. The territory went caputs, and then they  
25 started bringing back the Ric Flairs and the older

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1 individuals. They brought Ole back in there, you know,  
2 Koloff, older fellows.

3 Q And this was after 1995?

4 A That time.

5 Q They started about that time?

6 A Yes. You know, Dusty never did leave the  
7 scene. Went to the commentating, went to the --

8 Q Those folks that were being brought back,  
9 many of them were people who were about your age?

10 A Yes, yes, or close, or come up during that  
11 time, same time.

12 Q And you believe that it was Eric Bischoff  
13 that made the decision to bring those folks back?

14 A Did what? I don't know who made that  
15 decision. The word was Turner took over then, Turner  
16 was taking over.

17 Q When was that that the word was that  
18 Turner was taking over?

19 A Getting rid of the last part of it.

20 Q I'm sorry, I don't know what you mean by  
21 "getting rid of the last part of it."

22 A All the breakdowns. You know about all  
23 the breakdowns that they have, the changes from one  
24 person to the next one, and then the next one come back  
25 and this one go out, then they -- the changes.

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1 they would pay me the same as Vince McMahon is paying  
2 Rock, if it was fair, and push -- he capitalize on the  
3 downfall of this organization of using a black man --  
4 or a man of color, not totally black, man of color. I  
5 mean, Thunderbolt Patterson marketing.

6 Q Also, in terms of damages, you are also  
7 seeking damages in this lawsuit for emotional distress;  
8 is that correct?

9 A Well, you can clearly see that there's  
10 some -- I mean, and rightfully so.

11 Q You've told me some of that, but you would  
12 confirm for me that you are seeking damages for your  
13 emotional distress?

14 A I would love to be paid for everything. I  
15 would love for one time in my life with the wrestling  
16 organization to be treated equally and fair, just one  
17 time.

18 Q And you've already spoken some about the  
19 emotional distress that you have suffered. Is there  
20 other emotional distress that you've suffered other  
21 than what you've already testified to?

22 A Ain't that enough? Isn't what we talked  
23 about enough?

24 Q Have you ever seen a doctor about your  
25 emotional distress?



## EXHIBIT / ATTACHMENT

3

(To be scanned in place of tab)

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

Walker v. World Championship Wrestling, Inc., Turner  
Sports, Inc., Civ. File No. 100-CV-0367-CC  
Onoo v. World Championship Wrestling, Inc., Turner  
Sports, Inc., Civ. File No. 1:00-CV-0368-CC  
Norris v. World Championship Wrestling, Inc., Turner  
Sports, Inc., Civ. File No. 1:00-CV-0369-CC  
Easterling v. World Championship Wrestling, Inc., Turner  
Sports, Inc., Civ. File No. 1:00-CV-1715-CC  
Davis v. World Championship Wrestling, Inc. and Turner  
Sports, Inc., Civ. File No. 1:00-CV-1716-CC  
Worthen v. World Championship Wrestling, Inc. and Turner  
Sports, Inc., Civ. File No. 1:00-CV-1717-C  
Speight v. World Championship Wrestling, Inc. and Turner  
Sports, Inc., Civ. File No. 1:00-CV-1718-CC  
Saengsiphon v. World Championship Wrestling, Inc. and  
Turner Sports, Inc., Civ. File No. 1:00-CV-1719-CC  
Reeves v. World Championship Wrestling, Inc. and Turner  
Sports, Inc., Civ. File No. 1:00-CV-1720-CC  
Patterson v. World Championship Wrestling, Inc., Turner  
Sports, Inc. and Turner Entertainment Group, Inc.  
Civ. File No. 1:01-CV-1152-CC

COPY

DEPOSITION OF VINCENT J. RUSSO  
JANUARY 7, 2002  
10:15 A.M.

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Page 15

1           A       I'm talking about 2000 that I -- I was on  
2     the shelf.

3           Q       Okay. All right. You know, it may be a  
4     good thing for us to try and put together some sort of  
5     time line of --

6           A       Okay.

7           Q       -- what you -- sort of your periods of  
8     active work with WCW. You were first hired by WCW  
9     when?

10          A       Actually hired October 3. I started  
11     October 10 of 1999. Should I just go on or just wait  
12     until you finish writing it?

13          Q       Let me -- let me write it down here,  
14     otherwise --

15          A       Okay.

16          Q       -- I'll forget it.

17          A       Okay.

18          Q       So you started working, and you were hired  
19     as what?

20          A       As a creative director, which was just  
21     the -- the scripting of the television shows.

22          Q       Is that also effectively the head booker?

23          A       If you want to call it that.

24          Q       Okay. Or the head of the booking  
25     committee?

1 BY MR. ICHTER:

2 Q Mr. Russo, after you signed your contract  
3 with WCW to become the creative director, did you ever  
4 again have any contact with Dr. Shiller?

5 A No.

6 Q Did you under -- what did you understand  
7 his purpose in attending the Sunday meeting was?

8 A To try to convince me to sign a contract.

9 Q Andy Velkoff, you identified him as being  
10 at the Sunday meeting and as the person who drafted a  
11 contract for you, correct?

12 A Yes.

13 Q He's a lawyer?

14 A Yes.

15 Q Do you know who he was employed by?

16 A WCW.

17 Q Okay. So he was on staff at WCW?

18 A Yes.

19 Q Okay. During the time that you were with  
20 WCW, did you have any day-to-day contact with  
21 Turner Sports or employees of Turner Sports?

22 A I -- I'm not sure because I don't know if  
23 technical people that were working for WCW were  
24 employees of Turner Sports; you know, producers,  
25 directors, cameramen, et cetera. I don't know if they

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

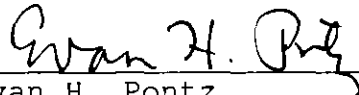
CLAUDE PATTERSON,	)	
	)	
Plaintiff,	)	
	)	CIVIL ACTION FILE
v.	)	
	)	NO. 1:01-CV-1152-CC
WORLD CHAMPIONSHIP WRESTLING, INC.,	)	
TURNER SPORTS, INC., TURNER	)	
ENTERTAINMENT GROUP, INC., and	)	
TURNER BROADCASTING SYSTEM, INC.,	)	
	)	
Defendants.	)	

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a copy of  
this **APPENDIX OF DEPOSITION EXCERPTS** upon the interested parties  
by hand delivery to:

Cary Ichter  
Kelly Jean Beard  
Charles Gernazian  
Michelle M. Rothenberg-Williams  
MEADOWS, ICHTER AND BOWERS, P.C.  
Fourteen Piedmont Center, Suite 1100  
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This 30th day of January, 2003.

  
\_\_\_\_\_  
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